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Attorneys for Plaintiff,
B. DOE, a minor, by and through his Guardian,
KERRIE WAGNER

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

* * *

B. DOE, a minor, by and through his Guardian,
KERRIE WAGNER,

Plaintiff,

vs.

NAPA VALLEY UNIFIED SCHOOL DISTRICT,
a public entity; ANNIE PETRIE, an individual;
TROY MOTT, an individual; GERALD HARRIS,
an individual; JESUS MARTINEZ, an individual;
J.T., an individual minor; B.B., an individual
minor; J.Z., an individual minor; R.J., an individual
minor; JOHN TORRES, an individual; FLORA
TORRES, an individual; and, DOES 1 through 100,
inclusive,

Defendants.

CASE NO. 3:17-cv-03753-SK

Complaint filed: 6/29/17

Trial Date: n/a

**DECLARATION OF JACOB D. FLESHER
IN SUPPORT OF MOTION TO FILE
MINOR'S COMPROMISE UNDER SEAL**

In support of the Motion to File the Petition for Minor's Compromise of Disputed Claim Under Seal,
I, Jacob D. Flesher, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the State of California
and the United State District Court, Northern District of California, and a shareholder in the law firm of
Flesher, Schaff & Schroeder, Inc., counsel for Plaintiff B. Doe, a minor, by and through his Guardian,
Kerrie Wagner.

2. Plaintiff and the DISTRICT defendants reached a settlement agreement based on a

1 mediator's proposal from Magistrate Judge Maria-Elena James on July 11, 2018. Confidentiality of the
2 settlement details, including the amount, is a condition of the settlement.

3 3. Court approval of the settlement of a minor's claim is required. In order to provide the
4 court with the necessary details to access the fairness and reasonableness of the settlements, the amount of
5 the settlement with the district must be revealed to the Court as well as identifying information and private
6 details regarding the minors involved in this case.

7 I declare under the penalty of perjury under the laws of the United States of America and the State
8 of California the foregoing is true and correct. Executed on this 7th day of August, 2018 in Rocklin,
9 California.

10
11 /s/ Jacob D. Flesher

12 JACOB D. FLESHER